1	Presented to the Court by the foreman of the Grand Jury in open Court, in the presence of
2	the Grand Jury and FILED in the U.S. DISTRICT COURT at Seattle, Washington.
3	August 3 20 22
4	By (12) Ravi Subramanian, Clerk Deputy
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7	UNITED STATES DISTRICT COURT FOR THE
8	WESTERN DISTRICT OF WASHINGTON AT SEATTLE
9	
10	UNITED STATES OF AMERICA, C. R22-108 R5M
11	Plaintiff
12	v. INDICTMENT
13	JOEY DAVID GEORGE,
14	Defendant.
15	Definition.
16	The Grand Jury charges that:
17	COUNT 1
18	(Interstate Threats)
19	On or about July 19, 2022, in King County, within the Western District of
20	Washington, and elsewhere, JOEY DAVID GEORGE knowingly and willfully did
21	transmit in interstate and foreign commerce from the State of Washington to New York,
22	communications containing a threat to injure another person, to wit, a phone call to a
23	supermarket threatening to shoot people inside the store.
24	All in violation of Title 18, United States Code, Section 875(c).
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COUNT 2

(Interstate Threats)

On or about May 12, 2022, in King County, within the Western District of Washington, and elsewhere, JOEY DAVID GEORGE knowingly and willfully did transmit in interstate and foreign commerce from the State of Washington to California, communications containing a threat to injure another person, to wit, a phone call to a restaurant threatening to shoot any Black or Hispanic patrons.

All in violation of Title 18, United States Code, Section 875(c).

COUNT 3

(Interstate Threats)

On or about September 11, 2021, in King County, within the Western District of Washington, and elsewhere, JOEY DAVID GEORGE knowingly and willfully did transmit in interstate and foreign commerce from the State of Washington to Maryland, communications containing a threat to injure another person, to wit, a phone call to a store threatening to shoot Black people.

All in violation of Title 18, United States Code, Section 875(c).

COUNT 4

(Interstate Threats)

On or about September 11, 2021, in King County, within the Western District of Washington, and elsewhere, JOEY DAVID GEORGE knowingly and willfully did transmit in interstate and foreign commerce from the State of Washington to Connecticut, communications containing a threat to injure another person, to wit, a phone call to a restaurant threatening to throw a bomb into the restaurant while it was open.

All in violation of Title 18, United States Code, Section 875(c).

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1 COUNT 5 2 (Interference with Federally Protected Activity) On or about May 12, 2022, in King County, within the Western District of 3 Washington, and elsewhere, JOEY DAVID GEORGE, by threat of force, willfully 4 intimidated and interfered with, and attempted to intimidate and interfere with, Black and 5 6 Hispanic customers and potential customers of a particular restaurant in San Bruno. California, because of the customers' race, color, and national origin, intending to 7 interfere with the customers' enjoyment of the goods, services, facilities, privileges, 8 advantages, and accommodations of the restaurant. 9 The Grand Jury further alleges that the offense involved the threatened use of a 10 dangerous weapon. 11 12 All in violation of Title 18, United States Code, Section 245(b)(2)(F). 13 14 A TRUE BILL: DATED: 8/3/2027 15 16 Signature of Foreperson redacted pursuant 17 to the policy of the Judicial Conference of the United States. 18 19 **FOREPERSON** 20 21 NIĆHOLAS W. BROWN United States Attorney 23 24 THOMAS M. WOODS Assistant United States Attorney REBECCA COHEN Assistant United States Attorney

Indictment - 3 *United States v. George*USAO No. 2022R00664